

WINDELS MARX LANE & MITTENDORF, LLP

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*Attorneys for Parmjit Singh Parmar and the
Parmar Entities*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11 Case

ORION HEALTHCORP, INC.
CONSTELLATION HEALTHCARE TECHNOLOGIES, INC.
NEMS ACQUISITION, LLC
NORTHEAST MEDICAL SOLUTIONS, LLC
NEMS WEST VIRGINIA, LLC
PHYSICIANS PRACTICE PLUS, LL
PHYSICIANS PRACTICE PLUS HOLDINGS, LLC
MEDICAL BILLING SERVICES, INC.
RAND MEDICAL BILLING, INC.
RMI PHYSICIANS SERVICES CORPORATION
WESTERN SKIES PRACTICE MANAGEMENT, INC.
INTEGRATED PHYSICIAN SOLUTIONS, INC.
NYNM ACQUISITION, LLC
NORTHSTAR FHA, LLC
NORTHSTAR FIRST HEALTH, LLC
VACHETTE BUSINESS SERVICES, LTD.
MDRX MEDICAL BILLING, LLC
VEGA MEDICAL PROFESSIONALS, LLC
ALLEGIANCE CONSULTING ASSOCIATES, LLC
ALLEGIANCE BILLING & CONSULTING, LLC
PHOENIX HEALTH, LLC
NEW YORK NETWORK MANAGEMENT, LLC

No. 18-71748 (AST)
No. 18-71749 (AST)
No. 18-71750 (AST)
No. 18-71751 (AST)
No. 18-71752 (AST)
No. 18-71753 (AST)
No. 18-71754 (AST)
No. 18-71755 (AST)
No. 18-71756 (AST)
No. 18-75757 (AST)
No. 18-75758 (AST)
No. 18-75759 (AST)
No. 18-75760 (AST)
No. 18-75761 (AST)
No. 18-75762 (AST)
No. 18-75763 (AST)
No. 18-75764 (AST)
No. 18-75765 (AST)
No. 18-75766 (AST)
No. 18-75767 (AST)
No. 18-71789 (AST)
No. 18-74545 (AST)

Debtors.

(Jointly Administered)

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Orion Healthcorp, Inc., *et al.*,

Plaintiffs,

v.

Parmjit Singh Parmar (a/k/a Paul Parmar), Sotirios Zaharis, Ravi Chivukula, Pavan Bakshi, Naya Constellation Health LLC, Alpha Cepheus, LLC, Constellation Health Investment, LLC, Constellation Health Group, LLC, Constellation Health, LLC, First United Health, LLC, Taira no Kiyomori LLC, Blue Mountain Healthcare, LLC, CC Capital CHT Holdco LLC, CHT Holdco LLC, PBPP Partners LLC, Axis Medical Services, LLC, Vega Advanced Care LLC, Pulsar Advance Care LLC, Lexington Landmark Services LLC, MYMSMD LLC, PPSR Partners, LLC, AAKB Investments Limited, Destra Targeted Income Unit Investment Trust, on behalf of unitholders, a Delaware Statutory Trust, United States of America, Aquila Alpha LLC, 2 River Terrace Apartment 12J, LLC, Dioskouroi Kastor Polydeuces, LLC, 21B One River Park LLC, Aquila Alshain LLC, Ranga Bhoomi LLC, Harmohan Parmar (a/k/a Harry Parmar), Kiran Sharma, The Red Fronted Macaw Trust, Young Conaway Stargatt & Taylor, LLP (in its capacity as Escrow Agent), Blue Cross Blue Shield of South Carolina, Honorable Trinidad Navarro, Insurance Commissioner of the State of Delaware, in his capacity as Receiver, and John Does 1 through 100 inclusive,

Adv. Pro No. 18-08053 (AST)

Defendants.

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Parmjit Singh Parmar, First United Health, LLC, and Constellation Health, LLC,

Cross-claim Plaintiffs,

v.

CC Capital CHT Holdco LLC and CHT Holdco LLC,

Cross-claim Defendants.

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**DOCUMENTS SUPPLEMENTAL TO
RESPONSE IN OPPOSITION TO MOTION
TO DISMISS CROSS-CLAIMS**

Defendants and Cross-claimants, Parmjit “Paul” Parmar (“Parmar”), First United Health,

LLC (“FUH”) and Constellation Health LLC (“CHLLC”), by and through their attorneys, Windels Marx Lane & Mittendorf, LLP, respectfully submit these *Documents Supplemental to Response in Opposition to Motion to Dismiss Cross-claims* (the “Response”).

The Supplements

As the Court is aware, the Response was filed by the Defendants and Cross-claimants on Monday, August 13, 2018, as required. The attached *Documents Supplemental to Response* were not available to counsel prior to August 14, 2018, and, although relevant and supportive of the statements in the Response, counsel was not able until now to file them with the Court. The aforesaid was beyond the control of counsel or Defendants and Cross-claimants.

REQUEST

For the foregoing reasons, Parmjit “Paul” Parmar, First United Health, LLC and Constellation Health LLC, respectfully request that the attached documents be accepted as Documents Supplemental to the Response.

Dated: August 15, 2018
New York, New York

Respectfully submitted,

/s/ Charles E. Simpson

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